

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)

vs.)

DEBBIE FOUST,)
Defendant.)

No. 3:12-00188

CHIEF JUDGE HAYNES

MOTION TO CONTINUE TRIAL AND TO
EXTEND PRETRIAL FILING DEADLINES

COMES NOW the Defendant, Debbie Foust, by and through her undersigned counsel, and respectfully requests that this Honorable Court enter an Order continuing the trial of this case from December 4, 2012, to a later date and resetting all pretrial and plea deadlines in accordance with the new trial date. For the reasons stated below, a resetting of the trial will give the parties adequate time to determine if the matter can be resolved without the need of a trial and for defense counsel to fulfill his obligations for Defendant Foust.

1. On October 5, 2012, the Court entered an Order scheduling this case for trial. (Docket Entry no. 8, Order). The scheduling Order provided for a plea deadline of November 16, 2012. This is the first request to continue the trial.

2. The Government has timely provided discovery. The Assistant U.S. Attorney has answered questions posed by counsel for Defendant Foust pertaining to parts of the discovery production.

3. An important function of defense counsel's obligations is to explore disposition

ORDER
Continuation is
GRANTED in the
interests of justice
to allow the
Defendant time to
finalize
plea
negotiations
Willston
asm
11-15-12